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December 12, 2007

United States District Court  
Southern District of New York  
U.S.D.J. Richard J. Holwell  
500 Pearl Street  
New York, New York 10007

Re: Sonia Urriola v. Guidant Corporation, et. al.  
U.S. DC Docket No.: 07-CV-10591 (RJH DSE)

Dear Justice Holwell:

Enclosed herein please find a fully executed Stipulation extending Plaintiff's time to respond to and/or cross move with regard to Guidant's Motion for a Stay in the above referenced matter.

Defendants have consented to extending Plaintiff's time to respond and/or cross move because our office has not received all of the medical records that would be necessary to draft a meaningful response and/or Cross Motion in this matter.

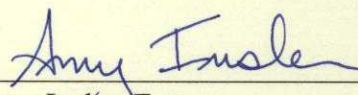
Currently an Order to Show Cause is pending in New York State Supreme Court which seeks immediate production of the medical records which have not yet been received by our office.

As such, it is respectfully requested that the Court So Order the Stipulation in this matter and extend Plaintiff's time to respond and/or cross move until January 21, 2008.

Respectfully yours,

Bonina & Bonina, P.C.

By:

  
Amy Insler, Esq.

Al:mg

Enc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SONIA URRIOLA,

Plaintiff,

-against-


GUIDANT CORPORATION, GUIDANT  
SALES CORPORATION, BOSTON SCIENTIFIC  
CORPORATION, MICHAEL LIU, M.D., BETH  
ISRAEL MEDICAL CENTER and BETH ISRAEL  
MEDICAL CENTER PHILIPS AMBULATORY  
CARE CENTER,


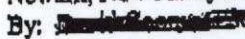
Defendants,

Counsel:

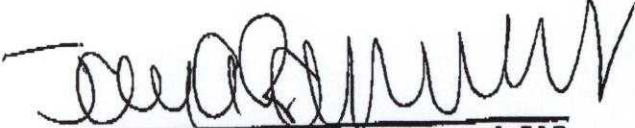
IT IS HEREBY STIPULATED, CONSENTED TO AND AGREED TO by and among the attorneys for all parties in the above Captioned matter that Plaintiff's time to respond to and/or Cross Move with reference to Defendants' Motion Seeking a Stay is hereby extended for forty-five (45) days until January 21, 2008.

Dated: Brooklyn, New York  
December 6, 2007

  
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Brooklyn, New York 11241  
By: Amy Insler, Esq.

  
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Attorneys for Defendants  
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and Boston Scientific Corporation  
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By:  Esq.

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and Beth Israel Medical Center Phillips  
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757 3<sup>rd</sup> Avenue  
New York, New York 10017  
By: Jay A. Rappaport, Esq.

SO ORDERED: \_\_\_\_\_